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Counsel for Defendant REYES

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

11 UNITED STATES OF AMERICA,) No. CR-10-0146 VRW
12 Plaintiff,)
13 vs.)
14 MARIA VIRGINIA REYES,)
15 Defendant.)
16

17 Third-party Joann Blessing-Moore and Defendants Maria Virginia Reyes and Christine D.
18 Reyes, through undersigned counsel, hereby stipulate and agree as follows:

19 1. When third-party Joann Blessing-Moore produces to each defendant's counsel of record
20 in this matter any documents containing sensitive tax, personal and/or financial information of
21 third parties and/or any documents reasonably designated "Confidential," she will do so subject
22 to the following conditions.

23 2. No counsel of record shall disclose any documents or information produced by third-party
24 Joann Blessing-Moore to anyone except his or her client, any defense witnesses, experts or
25 investigators retained in this case, or any defense staff working on the case, and no defendant,
26 defense witnesses, experts or investigators, or defense staff shall disclose such documents or

1 information to anyone, absent further order of the Court. However, this limitation on disclosure
2 shall not limit disclosure of the abovementioned information at trial, to the government, or to the
3 Court, provided that the submission is made in compliance with Civil Local Rule 79-5.

4 3. The documents and information described above shall be used only to prepare and
5 evaluate the defense in this proceeding. Any person to whom the documents or information are
6 disclosed must be provided with a copy of this Stipulation and Order. The materials provided to
7 defense counsel pursuant to this order, and any copies thereof, shall be destroyed or returned to
8 counsel for Joann Blessing-Moore at the conclusion of this case.

9 4. The documents described above shall not be copied at all unless copying is necessary for
10 preparation of the defense in this proceeding. Any copy of the materials that is made shall be
11 accompanied at all times by a copy of this Stipulation and Order. No document or copy thereof
12 shall be left with any defense witness or defendant.

13 5. Defense counsel, defendant, defense staff and their witnesses, experts and investigators in
14 this case shall retain possession and/or custody of the documents at all times.

15

16 IT IS SO STIPULATED.

17

18 DATED: September 17, 2010

/s/

19 LOREN D. STEWART
20 Assistant Federal Public Defender
21 Attorney for Maria Virginia Reyes

22

DATED: September 17, 2010

/s/

23 DAVID W. SHAPIRO
24 BOIES, SCHILLER & FLEXNER LLP
25 Attorneys for Christine D. Reyes

26

DATED: September 17, 2010

/s/

27 ERNIE M. MALASPINA
28 Hopkins & Carley
29 Attorneys for Joann Blessing-Moore, M.D.

1
2 [PROPOSED] ORDER
3

4 For the reasons and on the terms set forth above, the Court hereby ORDERS that the
5 above protective order apply in this case forthwith.
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7 IT IS SO ORDERED.
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9 DATED: 9/23/2010
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